IN THE CIRCUIT COURT OF TROUSDALE COUNTY, TENNESSEE FOR THE FIFTEENTH JUDICIAL DISTRICT AT HARTSVILLE

JUSTIN WRIGHT,	JURY DEMAND
Plaintiff,	No. <u>2020-CV-4881</u>
vs.	Div
CORECIVIC, INC. and CORECIVIC OF TENNESSEE, LLC,	FILE KIM TAYLOR 2:240 pm DEC 2 9 2020
Defendants.	CIRCUIT COURT CLERK BY <u>Sandy Tenlinso</u> ns

COMPLAINT

Plaintiff Justin Wright files this Complaint against Defendants CoreCivic, Inc. and CoreCivic of Tennessee, LLC, arising out of an incident that occurred on or about January 1, 2020, at the Trousdale Turner Correctional Center and in support, would show as follows:

I. PARTIES

- 1. Plaintiff Justin Wright is an adult resident of Memphis, Shelby County, Tennessee.
- 2. Defendant CoreCivic, Inc. is a corporation duly incorporated under the laws of the state of Maryland and is licensed to do business in the state of Tennessee. This Defendant can be served with process by serving its registered agent for service of process in Tennessee, CT Corporation System, 300 Montvue Rd., Knoxville, Tennessee 37919. Upon information and belief, Defendant CoreCivic, Inc. is a private corrections management firm that managed the Trousdale Turner Correctional Center and that employed all of the prison guards at this facility at all relevant times to this Complaint.

 3. Defendant CoreCivic of Tennessee, LLC is a company duly licensed and organized under the laws of the state of Tennessee. This Defendant can be served with process by serving its registered agent for service of process in Tennessee, CT Corporation System, 300 Montvue Rd., Knoxville, Tennessee 37919. Upon information and belief and by way of alternative pleading, Defendant CoreCivic of Tennessee, LLC is a private corrections management firm that managed the Trousdale Turner Correctional Center and that employed at all of the prison guards at this facility at relevant times to this Complaint.

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- 4. Defendant CoreCivic, Inc. and Defendant CoreCivic of Tennessee, LLC are hereinafter collectively referred to as the "CoreCivic Defendants." When Plaintiff refers to the CoreCivic Defendants throughout this Complaint, he is referring to the CoreCivic Defendant that owned, operated and managed the Trousdale Turner Correctional Center.
- 5. The CoreCivic Defendants operate and perform business within the state of Tennessee, and at all times relevant to this action, owned and/or operated and/or managed the Trousdale Turner Correctional Center in Trousdale County, Tennessee (the "Center"), and were responsible for providing a safe environment for Plaintiff and others at the Center while detained/incarcerated at the Center. Moreover, the CoreCivic Defendants employed the prison guards and staff members and are vicariously liable for their actions and inactions in this case. Finally, the CoreCivic Defendants were (and are) responsible for developing and implementing policies, protocols, procedures and systems, and training their employees and agents to adhere to such systems, for the purpose of providing individuals at the Center with a reasonably safe environment and to take reasonable steps to protect Plaintiff from foreseeable injuries at all times relevant to this claim and failed to do so with regard to Mr. Wright and are, therefore, directly liable. The CoreCivic Defendants are also vicariously

liable for the actions and inactions of their employees and agents, actual and apparent. The CoreCivic Defendants owed a duty to Mr. Wright and breached that duty and are subject to liability in this case.

III. JURISDICTION AND VENUE

- 6. This Court has jurisdiction over this action pursuant to inter alia, T.C.A. §16-10-101 and other applicable laws.
- 7. Venue proper in this Court pursuant to inter alia, T.C.A. §20-4-101 et. seq. because all or part of this cause of action arose within Trousdale County, Tennessee.
- 8. Plaintiff brings this action, in part, pursuant to federal statutes including, but not limited to 42 U.S.C. §1983 and §1988 for which this Court has concurrent jurisdiction with Federal Court. Plaintiff is also bringing this action pursuant to state law as well.

V. FACTUAL ALLEGATIONS

- 8. At all times relevant hereto, Justin Wright was an inmate at the Trousdale Turner Correctional Center located at 140 Macon Way, Hartsville, Tennessee 37074, which is owned, operated and managed by the CoreCivic Defendants.
- 9. Mr. Wright was incarcerated for Theft of Property \$10,000 \$60,000 and Aggravated Burglary but he did not have a history of aggressive and/or violent behavior. Notwithstanding this fact, he was assigned to a pod with several inmates that had a history of violent behavior, including an inmate that was serving a life sentence.
- 10. Plaintiff asserts that he should have never been placed in a pod with violent offenders and that he would not have been injured had Defendants not placed him in this pod. Plaintiff asserts that the CoreCivic Defendants acted with deliberate indifference to his health

and welfare by putting him in a pod with violent offenders and/or at minimum, they were negligent in doing so.

- 11. On or about December 30, 2019, Plaintiff told the unit manager (Ms. Themmes) who was employed by the CoreCivic Defendants that other inmates in his pod had threatened him. Plaintiff pleaded with guards to move him or to take action to protect him from this group of inmates that had threatened him. Rather than moving him or taking some action to protect him, the guards made fun of Plaintiff and told him that he better give the other inmates what they wanted. Upon information and belief, Ms. Themmes had a history of telling gang members that inmates had complained about them, resulting in the complaining inmates getting beat up and Plaintiff asserts that Ms. Themmes told the gang members that were threatening Plaintiff about his complaints to her.
- 12. On the morning of January 1, 2020, Plaintiff woke up to an inmate pulling a knife on him. The inmate took his television and threatened him. Plaintiff does not know the inmate's name, but he was housed in bunk 212 in W Building, Alpha dorm at the time of this attack.
- 13. Later that same day (January 1, 2020) at approximately 11:00 p.m., Plaintiff was violently attacked by one or more inmates while he slept. He ultimately passed out in his cell at some point and nobody came to his aid. No guards were there to monitor the inmates in the pod and/or to break up fights in order to minimize injury and in fact Defendants and their employees failed to secure medical attention for Mr. Wright for a prolonged period of time.
- 14. On January 2, 2020, Plaintiff was unable to stand or get out of bed for the 9:00 a.m. inspection. Notwithstanding Plaintiff's obvious need for medical attention, guards at

the Center waited for a prolonged period of time before calling someone with medical training to evaluate Plaintiff. After Plaintiff was finally evaluated, he was transported to a hospital for treatment for his injuries.

- 15. Plaintiff suffered serious injuries in this foreseeable attack, including a fractured nasal bone, multiple contusions, neck injury, upper and lower back injury, right shoulder separation.
- 16. Upon information and belief, Defendants have on numerous occasions failed to take reasonable steps to protect inmates from being assaulted by other inmates after having been notified of threats of an attack. Moreover, upon further information and belief, Defendants have on numerous occasions delayed in making arrangements for injured inmates to be seen by medically trained staff
- 17. Defendants knew that Plaintiff had been threatened by other inmates prior to the subject attack and further knew or should have known that he sustained serious injuries in this attack for several hours before making arrangements to get him the appropriate medical care in deliberate indifference to his health and welfare.
- 18. Upon information and belief, Defendants did not have a sufficient number of guards on duty at the time of the incident and/or during the hours leading up to the attack to protect Plaintiff and the other inmates from harm.
- 19. Upon information and belief, Defendants have on numerous occasions failed to properly monitor inmates who have a history of violence and have placed inmates with histories of violent and/or aggressive behavior with other inmates that did have any violent or aggressive behavior in their histories.

20. Plaintiff submits that it is Defendants' responsibility to house inmates at the Trousdale Turner Correctional Center in a safe and secure environment.

- 21. Plaintiff submits that Defendants had a duty to guard and provide security for Mr. Wright and other inmates to protect them from foreseeable attacks, and Defendants breached and violated this duty on or about January 1, 2020.
- 22. Defendants knew the inmates in Plaintiff's pod had a history of violent behavior and had a duty to take reasonable measures to protect Plaintiff and failed to do so which constitutes both negligence and a civil rights violation. Moreover, Defendants knew that inmates had threatened to attack Plaintiff before this incident and failed to take any steps to protect him from harm.
- 23. As a direct and proximate result of the actions and omissions of Defendants, directly and through their agents, Plaintiff suffered serious and permanent injuries.
- 24. The injuries, harms and damages sustained by Plaintiff were a foreseeable consequence of the actions and inactions of the Defendants by and through their agents.
- 25. The employees of Defendants specifically or generally identified herein were at all times acting in the course and scope of their employment as state actors/agents of Defendants.
- 26. Defendants failed to have constitutional policies or practices in place to prevent situations like the ones encountered by Plaintiff and Plaintiff asserts that such inadequate policies or lack of policies were the moving force behind the constitutional violations asserted herein.
- 27. Upon information and belief, Defendants engaged in a custom, practice or pattern of violating the civil rights of inmates by permitting and/or failing to protect them.

28. Upon information and belief, Defendants engaged in a custom, practice or pattern of violating the civil rights of immates by failing to provide and/or obtain treatment for their serious medical needs such as the need experienced by Plaintiff on or about January 1, 2020.

- 29. Plaintiff exhibited obvious signs of being in need of serious and immediate medical care and Defendants repeatedly violated his civil rights by failing to make any efforts to get him timely seen by a licensed healthcare provider in deliberate indifference to his health and welfare.
- 30. On and before January 1, 2020, Defendants, upon information and belief, repeatedly failed to enforce rules, policies and procedures they had in place protecting inmates at the correctional facility and requiring their employees to address violent behavior of inmates.
- 31. On and before January 1, 2020, Defendants, upon information and belief, repeatedly failed to enforce rules, policies and procedures they had in place monitoring inmates.
- 32. Defendants acted with deliberate indifference by engaging in a pattern of conduct of refusing to provide prisoners with security and protection from foreseeable attacks.
- 33. Defendants acted with deliberate indifference by failing to train their guards to immediately respond to inmates in obvious need of assistance.
- 34. Defendants acted with deliberate indifference by failing to train its employees on how to recognize situations where inmates were at high risk of being attacked by other inmates and then by failing to train them on how to break up fights before an inmate sustains serious injuries, like the injuries sustained by Plaintiff on or about January 1, 2020.

- 35. On the day of Plaintiff's injury at the Trousdale County Correctional Center, Defendants engaged in a pattern of deliberately indifferent conduct by failing to timely respond to his medical needs by making arrangements for someone with medical training to evaluate him for his injuries.
- 36. By way of alternative pleading, Defendants breached multiple duties of care owed to Plaintiff, each of which were the proximate cause of his pain and suffering.

IV. FIRST CAUSE OF ACTION-CIVIL RIGHTS VIOLATIONS BY DEFENDANTS

- 37. The allegations previously set forth in this Complaint are incorporated herein by reference.
- 38. At all relevant times, Defendants and their employees, agents and apparent agents were deliberately indifferent to Plaintiff's cries for help.
- 39. Defendants committed acts which shock the conscience and deprived Plaintiff of his constitutional rights.
- 40. Defendants committed the above-described actions and omissions under color of law and under color of their authority as state actors, substantially depriving Mr. Wright of his rights, privileges, and immunities guaranteed to him as a citizen of the United States in violation of 42 U.S.C. §1983 and deprived Mr. Wright of rights guaranteed to him by the Fourth, Eighth, and Fourteenth Amendments of the United States Constitution including, but not limited to:
 - A. Right to be protected from inmates with histories of violence;
 - B. Right to be protected from attack by other inmates after threats were made;
 - C. Right to reasonable, necessary and adequate medical treatment;

- D. Right to adequate correctional care;
- E. Freedom from a deprivation of life and liberty without due process of law; and
- F. Freedom from cruel and unusual punishment.
- 41. Under the Fourth and Fourteenth Amendments to the United States

 Constitution, pretrial detainees have a right to adequate medical treatment that is analogous to a prisoner's Eighth Amendment right.
- 42. Defendants were deliberately indifferent to Mr. Wright's needs when they put him in a pod with inmates with histories of violent behavior and then when they failed to move him out of that pod or take other action to protect him after other inmates had expressly threatened him with harm and especially after he had been robbed by an inmate with a knife several hours before the attack.
- 43. Defendants, through its agents and policymakers, engaged in the actions described above while under the color of state law.
- 44. Defendants, through its agents and employees, knew of and disregarded a substantial risk of serious harm to Mr. Wright's health and safety.
- 45. The policies and/or customs of Defendants were the moving force behind the constitutional violations.
- 46. The policies and/or customs of Defendants were implemented with deliberate indifference to the rights of inmates, such as Mr. Wright.
- 47. Plaintiff avers that he had the constitutional right to be free from cruel and unusual punishment or, as an inmate, from any punishment, and that right was violated.

- 48. Defendants had an unconstitutional policy or practice of not seeking immediate medical attention for immates/arrestees who have who needed medical attention.
- 49. Plaintiff alleges that Defendants were required to have a policy in place requiring medical providers to be contacted as soon as possible during or following a physical altercation between inmates. The failure to have such a policy or practice in place was in violation of Mr. Wright's Fourth, Eighth, and Fourteenth Amendment rights.
- 50. Plaintiff further alleges that Defendants were required to have a policy in place requiring medical providers to be contacted as soon as possible during or following a physical altercation between inmates and jailers. The failure to have such a policy or practice in place was in violation of Mr. Wright's Fourth, Eighth, and Fourteenth Amendment rights as well.
- 51. Defendants had a policy, custom, common practice or tolerated a pattern of conduct permitting guards to observe an inmate who needed medical attention without contacting medical assistance immediately or within a reasonable period of time.
- 52. Defendants condoned, tolerated and ratified all of the unconstitutional conduct committed by its employees as set forth herein.
- 53. Defendants' employees acted with deliberate indifference to the serious medical needs of Mr. Wright by failing to notify medical personnel sooner that he was in severe distress.
- 54. As a direct and proximate result of these constitutional violations by Defendants, Plaintiff experienced severe and permanent personal injuries.

- 55. Defendants, through its policies, procedures, and patterns of conduct, violated the Plaintiff's civil rights with deliberate indifference. Moreover, Defendants through its failure to adequately train its staff, allowed, condoned, and ratified this type of conduct at the Trousdale Turner Correctional Center where the Plaintiff's civil rights were violated.
- 56. Defendants' unconstitutional policies, absence of policies, customs, and practices were the moving force of the constitution deprivations suffered by Plaintiff.
- 57. Defendants tolerated a pattern of conduct, as set forth herein, by its employees and apparent agents which deprived Plaintiff of his federally-protected rights.
- 58. All constitutional violations alleged herein shock the conscience of the court and society and were committed in deliberate indifference to Plaintiff's federally-protected rights including, but not limited to, adequate medical care.
- 59. Defendants had a consistent pattern and practice of being deliberately indifferent to the adequate medical health of inmates such as the Plaintiff.
- 60. All actions and inactions alleged herein were the cause in fact and proximate cause of the foreseeable harm suffered by Plaintiff.

V. SECOND CAUSE OF ACTION-NEGLIGENCE OF DEFENDANTS AND THEIR AGENTS

- 61. The allegations set forth in the previous paragraphs of this Complaint are incorporated herein by reference.
- 62. Defendants are being sued for acts of negligence including, but not limited to, negligent hiring, negligent retention of employees, negligent supervision of employees, and failing to take necessary precautions to prevent the injuries suffered by Plaintiff. Moreover, Defendants are being sued for the negligent acts of its employees and/or agents who were acting in the course and scope of their employment at all times relevant to this action and

the outrageous conduct of the unit manager that had an obligation to protect Plaintiff but failed to do so.

- 63. Defendants owed a duty to exercise reasonable care in housing Plaintiff.

 Defendants violated that duty causing foreseeable harm to Plaintiff.
- 64. Defendants negligently failed to supervise their employees resulting in the foreseeable harm of Plaintiff.
- 65. Defendants were negligent in their failure to seek timely medical care for Plaintiff.
- 66. Defendants are liable under applicable state law for the actions and omissions committed by its employees who were acting within the scope of their employment at all times in connection with their actions.
- 67. As a direct and proximate result of its failure to properly hire, train, and supervise its employees and agents, Defendants should have reasonably foreseen that Plaintiff was in danger of being attacked by other inmates in the pod where he was housed on January 1, 2020 and they failed to take action to protect him from harm.
- 68. Defendants, as well as all other agents or apparent agents of Defendants, owed the Plaintiff a duty to use reasonable care under all applicable circumstances, failed to exercise such care, proximately and directly caused harm to the Plaintiff.
- 69. All of the Plaintiff's injuries were the foreseeable consequences of the negligence of the Defendants.
- 70. Defendants, and the Defendants' agents and apparent agents were negligent by failing to seek or provide Plaintiff with medical attention he required after he exhibited signs of being injured and altogether failed to take any action to prevent this tragic event.

Plaintiff was injured as a direct result of this negligent conduct and suffered intense emotional and physical pain dur to his injuries.

- 71. Defendants, as well as other employees and agents, negligently failed to follow proper policies, protocols, and/or standing orders regarding inmates such as Plaintiff on or about January 1, 2020.
- 72. Plaintiff submits that Defendants, its agents, apparent agents, and/or employees including, acted with negligence and/or gross negligence.
- 73. Defendants should be held vicariously liable for all the actions of its employees, agents, and apparent agents.
- 74. All allegations set forth herein against all employees and agents of Defendants are incorporated herein by reference inasmuch as Plaintiff alleges employees and agents of Defendants to be apparent agents of Defendants.
- 75. Defendants negligently and improperly classified Plaintiff and other inmates in his pod, and they should not have been housed in the same pod.
- 76. Plaintiff suffered severe and permanent injuries as a direct result of the negligence alleged herein. Accordingly, Plaintiff is entitled to compensatory damages and punitive damages for the conduct alleged herein as provided for under all applicable law.

VII. DAMAGES

77. The allegations previously set forth in this Complaint are incorporated herein by reference.

- 78. Plaintiff suffered greatly as a result of the wrongful conduct alleged herein. Accordingly, Plaintiff is entitled to compensatory damages for the conduct alleged herein as provided for under all applicable law.
- 79. Plaintiff asserts he is entitled to all available damages under applicable law, including but not limited to damages for his conscious pain and suffering, mental anguish, medical expenses, attorneys' fees and legal expenses.

VIII. PUNITIVE DAMAGES

- 80. The allegations previous set forth in this Complaint are incorporated herein by reference.
- Plaintiff alleges that the conduct of Defendants' unit manager was intentional, willful, reckless, grossly negligent and/or malicious entitling Plaintiff to a substantial award of punitive damages to be determined by the trier of fact in this action.

WHEREFORE, premises considered, Plaintiff prays:

- a. That Defendants be served with a copy of the Complaint filed in this matter;
- b. That Plaintiff be awarded compensatory damages in the amount of \$500,000.00;
- c. That Plaintiff be awarded punitive damages in an amount to be determined by the trier of fact if it is determined that punitive damages are warranted in this case;
- e. That Plaintiff be awarded such other relief, both general and special, including attorneys' fees and costs to which he may be entitled. In the event Plaintiff is successful in his civil rights claim, he seeks fees and costs pursuant to 42 U.S.C. §1988 and all other applicable laws.

PLAINTIFF HEREBY DEMANDS A JURY FOR THOSE CAUSES OF ACTION WHERE THE LAW PERMITS A TRIAL BY JURY.

Respectfully submitted,

Jeffrey S. Rosenblum, #13626 Matthew T. May, #25547 Rosenblum & Reisman, PC 6070 Poplar Avenue, Suite 550 Memphis, Tennessee 38119 (901) 527-9600

IN THE CIRCUIT COURT OF TROUSDALE COUNTY, TENNESSEE FOR THE FIFTEENTH JUDICIAL DISTRICT HARTSVILLE

Docket No. <u>2020 CV-488</u>		AD DAMNUN	1 S
JUSTIN WRIGHT,			
Plaintiff,	vs.	CORECIVIC, IN TENNESSEE, L	NC. AND CORECIVICIOF LC, KIM TAYLOR 2: Hepn
TO: CoreCivic of Tennessee, LLC Registered Agent: CT Corporation System 300 Montvue Road Knoxville, TN 37919		Defendants.	CIRCUIT COURT CLES BY Sander Johnson Method of Service TN SECRETARY OF STATE
You are hereby summoned and required to defend a civ serving a copy of your answer to the Complaint on Jeffrey & Reisman, P.C., 6070 Poplar Avenue, Suite 550, Mer THIRTY (30) DAYS after this summons has been served judgment by default may be taken against you for the relief	mphis, Teaupon you, ef demande	nnessee 38119 and	mey, whose address is Rosenblum telephone, (901) 527-9600 , withir
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TO THE D	EFENDAI	ÑT(S):	
NOTICE: Pursuant to Chapter 919 of the Public Acts of 1980, your Tennessee law provides a ten thousand dollar (\$10,000) personal If a judgment should be entered against you in this action and you oath, of the items you wish to claim as exempt with the Clerk of the thereafter as necessary; however, unless it is filed before the judgarnishment issued prior to the filing of the list. Certain items a include items of necessary wearing appared (clothing) for yourself such appared, family portraits, the family Bible and school book recover them. If you do not understand your exemption right or he	u wish to cl he Court. The dgment becare automat f and your f	exemption from execu- laim property as exem- the list may be filed at comes final, it will no- cically exempt by law family and trunks or o	tion or seizure to satisfy a judgment. pt, you must file a written list, under any time and may be changed by you t be effective as to any execution or and do not need to be listed. These ther receptacles necessary to contain
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Clerk			
•	By: _		D.C.
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#Gase 3:21-cv-00276 Document 1-1, Filed 04/05/21 Page 16 of 28 Page 10 #: 19

Nd E0: 10 NOW/ 1707/10/834

By delivering on the day of Complaint to the following defendant(s)	. 20 ar	IN SUMMONS: It M. a copy of the summons	and a copy of the
Signature of Person Accepting S	By ervice	y:Sheriff or other Authorized Person to S	erve Process
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DATED: this day of	, 20		
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IN THE CIRCUIT COURT OF TROUSDALE COUNTY, TENNESSEE FOR THE FIFTEENTH JUDICIAL DISTRICT HARTSVILLE

Dock	et No. <u>2020-W-4881</u>		AD DAMNUM S	3
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то:	CoreCivic, Inc. Registered Agent: CT Corporation System 300 Montvue Road Knoxville, TN 37919			DEC 2 9 2020 CIRCUIT COURT CLERK BY Souls Tombus ONE 1ethod of Service N SECRETARY OF STATE
& Reis	re hereby summoned and required to defend a cive a copy of your answer to the Complaint on Jeffrey sman, P.C., 6070 Poplar Avenue, Suite 550, Me. TY (30) DAYS after this summons has been served ent by default may be taken against you for the relie	'S. Rosei mphis, T	Iblum, Plaintiff's attorn Tennessee 38119 and te	ley, whose address is Rosenblum lephone, (901) 527-9600, within of service. If you fail to do so, a
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	, Clerk of the Court, Trousda	ale Count	, Tennessee, certify this t	o be a true and accurate copy as
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Case 3:21-cv-00276 Document 1-1 Filed 04/05/21 Page 18 of 28 PageID #: 21

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Complaint to the following defendant	:(s):	···		at
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Name of Private Process Server		Address		
Company		Phone		

ROSENBLUM & REISMAN ATTORNEYS AT LAW

T 901.527.9600 F 901.527.9620 www.rosenblumandreisman.com

Triad Centre III 6070 Poplar Avenue, Suite 550 Memphis, TN 38119

March 9, 2021

Trousdale County Circuit Court

Attn: Court Clerk

VIA FACSIMILE: 615-374-1100

Re: Justin Wright vs. CoreCivic, Inc. and CoreCivic of Tennessee, LLC

Docket No. 2020-cv-4881

Dear Court Clerk:

Attached please find the Return of Service of Summonses for Defendants CoreCivic, Inc. and CoreCivic of Tennessee, LLC.

The original Summonses were issued and sent out through your office for service but are yet to be returned. The Defendants' attorney, Erin Palmer Polly, has agreed to accept service on their behalf via electronic mail and we are attaching the returned and executed summonses for filing.

If you should have any questions or need any additional information, please let me know. Thank you.

Sincerely,

Matthew T. May

cc: Erin Palmer Polly, Attorney

via electronic mail: erin.polly@klgates.com

IN THE CIRCUIT COURT OF TROUSDALE COUNTY, TENNESSEE FOR THE FIFTEENTH JUDICIAL DISTRICT HARTSVILLE

Dock	cet No. <u>2020 CV-488</u> 1		4D D 43 0 000	
JUST	TIN WRIGHT,		AD DAMNUM	
Plain		vs.	CORECIVIC, IN TENNESSEE, LI	C. AND CORECIVICIOF C.C, KIM TAYLOR 2: Xepm
			Defendants.	DEC 2 9 2020
TO:	CoreCivic of Tennessee, LLC			CIRCUIT COURT CLERI
	Registered Agent: CT Corporation System 300 Montvue Road Knoxville, TN 37919			Method of Service Tombuse TN SECRETARY OF STATE
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			Hartsville, TN 37	074

P. 004

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Complaint to the following defendant(s): CoreCivic of Tennessee, LLC	f th
by email to Frin Palmer Polly, attorney for CoreCivic of Tennessee, LLC, by agreement	
ATT VI	
Signature of Person Accepting Service By: Sheriff or other	
Sheriff or other Authorized Person to serve Process	
RETURN OF NON-SERVICE OF SUMMONS	
I HEREBY CERTIES THAT I HAVE	
I HEREBY CERTIFY THAT I HAVE NOT SERVED THE WITHIN SUMMONS:	
To the named Defendantbecause	
is (are) not to be found in this County after diligent search and inquiry for the	
DATED: this day of	
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Sheriff or other Authorized Person to Serve Process	
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IN THE CIRCUIT COURT OF TROUSDALE COUNTY, TENNESSEE FOR THE FIFTEENTH JUDICIAL DISTRICT HARTSVILLE

Dock	cet No. <u>2020-CV-4881</u>		AD DAMNUM \$	
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Plain		VS.	CORECIVIC, INC. AND TENNESSEE, LLC,	CORECIVIC PEE KIM TAYLOR L: Llpm
TO:	CoreCivic, Inc. Registered Agent: CT Corporation System 300 Montvue Road Knoxville, TN 37919			CIRCUIT COURT CLERK BY Joule Towlers I of Service CRETARY OF STATE
& Reis	re hereby summoned and required to defend a city a copy of your answer to the Complaint on Jeffrey sman, P.C., 6070 Poplar Avenue, Suite 550, Mery (30) DAYS after this summons has been served and by default may be taken against you for the relief	emphis, T	ennessee 38119 and telephon	ose address is Rosenblum
TESTE	D AND ISSUED 12-29 20 2	20	Sandy Imler	Clerk
	TO THE D	DEFENDA	ANT(S):	
If a judge oath, of the thereafter garnishm include it such appa	Pursuant to Chapter 919 of the Public Acts of 1980, you leave have provides a ten thousand dollar (\$10,000) personment should be entered against you in this action and you wish to claim as exempt with the Clerk of as necessary; however, unless it is filed before the juent issued prior to the filing of the list. Certain items ems of necessary wearing apparel (clothing) for yourse arel, family portraits, the family Bible and school bookers. If you do not understand your exemption right or here.	al property ou wish to the Court. Idgment be are automa if and your	exemption from execution or se- claim property as exempt, you m The list may be filed at any time a ecomes final, it will not be effect atically exempt by law and do not family and trunks or other recept	ust file a written list, under and may be changed by you tive as to any execution or or need to be listed. These tacles necessary to contain
I,	, Clerk of the Court, Trousda	ale County,	Tennessee, certify this to be a tr	ue and accurate copy as
Clerk				
		By:		D.C.
			Kim Taylor Circuit Court Cl 303 East Main Hartsville, TN	Street, Room #2
			_	6 P 8

P. 002

I HEREBY CERTIFY THAT I HAVE SERVED	THE WITHIN CUR OF CONTR.
By delivering on the 8th day of March	20 21 - 41:45
Complaint to the following defendant(s): CoreC	, 2021 at11:15 a.mM. a copy of the summons and a copy of the
- COICE	oreCivic, Inc., by agreement at
ay officer to affice a conjugate of the	
	Miller
	. Ву:
Signature of Person Accepting Service	
	Sheriff or other Authorized Person to Serve Process
RETURN OF	NON-SERVICE OF SUMMONS
I HEREBY CERTIFY THAT I HAVE NOT SERV	ED THE WITHIN SUMMONS:
To the named Defendant	
To the named Defendant	because
following reason(s):	be found in this County after diligent search and inquiry for the
ronowing reason(s):	
DATED: this day of	, 20
	Dr.,
	By:Sheriff or other Authorized Person to Serve Process
	of other Authorized Person to Serve Process
PRIVATE PROCESS SERVER (PLEASE PRINT	TOTAL MAY Y ARREST
DICTION OF THE PROPERTY OF THE	THE FOLLOWING)
Name of Private Process Server	
Trame of Private Process Server	Address
Company	Phone

IN THE CIRCUIT COURT OF TROUSDALE COUNTY, TENNESSEE FOR THE FIFTEENTH JUDICIAL DISTRICT HARTSVILLE

Docket No. 2020-W-4881		AD DAMNUM	\$
JUSTIN WRIGHT,			C. AND CORECIVIC OF
Plaintiff,	vs.	TENNESSEE, LL	C, KIM TAYLOR L: Hepm
· · · · ·		*** ** **	DEC 2 9 2020
		Defendants.	CIRCUIT COURT CLERK
TO: CoreCivic, Inc. Registered Agent: CT Corporation System 300 Montvue Road Knoxville, TN 37919			BY Souls Towleson'S Method of Service TN SECRETARY OF STATE
You are hereby summoned and required to defend a serving a copy of your answer to the Complaint on Jeffr & Reisman, P.C., 6070 Poplar Avenue, Suite 550, NTHIRTY (30) DAYS after this summons has been serv judgment by default may be taken against you for the results.	ey S. Rose 1emphis , T ed upon yo	nblum, Plaintiff's atto Fennessee 38119 and u, not including the da aded in the Complaint.	rney, whose address is Rosenblum telephone, (901) 527-9600, within y of service. If you fail to do so, a
TESTED AND ISSUED 12-29 20	20	Sardy _	mlinsons , D.C.
	E DEFEND		
NOTICE: Pursuant to Chapter 919 of the Public Acts of 1986 Tennessee law provides a ten thousand dollar (\$10,000) personal fine provides a ten thousand dollar (\$10,000) personal fine provides a ten thousand dollar (\$10,000) personal fine provides a fine provided against you in this action and each, of the items you wish to claim as exempt with the Clerk thereafter as necessary; however, unless it is filed before the garnishment issued prior to the filing of the list. Certain ite include items of necessary wearing apparel (clothing) for you such apparel, family portraits, the family Bible and school is recover them. If you do not understand your exemption right	sonal proper d you wish to of the Court e judgment ms are autor arself and you books. Shou	ty exemption from exect to claim property as exem t. The list may be filed at becomes final, it will no matically exempt by law our family and trunks or tld any of these items be	ation or seizure to satisfy a judgment. apt, you must file a written list, under any time and may be changed by you be effective as to any execution or and do not need to be listed. These other receptacles necessary to contain seized, you would have the right to
I,, Clerk of the Court, Trot	usdale Coun	ty, Tennessee, certify thi	s to be a true and accurate copy as
Clerk	B	у:	D.C.
		Circui 303 E	Taylor t Court Clerk ast Main Street, Room #2 ville, TN 37074
			ADA FOR ASSISTANCE CALL 615-374-3411

I HEREBY CERTIFY THAT I HAVE SERVI	ED THE WITHIN SUMMONS:
By delivering on the 8th day of March	, 20 21 at 11:15 a.mM. a copy of the summons and a copy of the
Complaint to the following defendant(s):Co	oreCivic, Incat
by email to Erin Palmer Polly, Attorney fo	r CoreCivic, Inc., by agreement
Furin Patomer Porley	By: ### 1
Signature of Person Accepting Service	Sheriff or other Authorized Person to Serve Process
RETURN	OF NON-SERVICE OF SUMMONS
I HEREBY CERTIFY THAT I HAVE NOT S	ERVED THE WITHIN SUMMONS:
To the named Defendant	because
is (are) no	ot to be found in this County after diligent search and inquiry for the
following reason(s):	
DATED: this day of	, 20
	By:
	Sheriff or other Authorized Person to Serve Process
PRIVATE PROCESS SERVER (PLEASE P	RINT THE FOLLOWING)
Name of Private Process Server	Address
Company	Phone

IN THE CIRCUIT COURT OF TROUSDALE COUNTY, TENNESSEE FOR THE FIFTEENTH JUDICIAL DISTRICT HARTSVILLE

Docket No.	.2020-0	V-4881		AD DAMNUI	A \$	<u> </u>	
Justin W	VRIGHT,		vs.	CORECIVIC, I TENNESSEE, L		KIM TAYLOR	
Plaintiff,						Д: Ж орм DEC 2 9 2020	
Re ₂	reCivic, Inc. gistered Agent: Montvue Roa oxville, TN 37.		tem	Defendants.	Method of S	CIRCUIT COURT CLERK BY Source Townson Service TARY OF STATE	ĸ
serving a co & Reisman THIRTY (3	py of your answ a, P.C., 6070 Po 0) DAYS after	l and required to defender to the Complaint on oplar Avenue, Suite 55 this summons has been against you for the taken against you for the control of the con	Jeffrey S. Rosen 50, Memphis, T served upon you	blum, Plaintiff's at ennessee 38119 an i, not including the	torney, whose of telephone, (so day of service. at.	address is Rosenblum 901) 527-9600, within If you fail to do so, a	
TESTED A	ND ISSUED _	12-29	_20 <u>20</u>	Sardy _	Soulines	and D.C.	
			THE DEFEND.				
Tennessee lav If a judgment oath, of the it- thereafter as ; garnishment ; include items such apparel,	w provides a ten t should be entere ems you wish to o necessary; howev issued prior to the of necessary wer family portraits,	919 of the Public Acts of thousand dollar (\$10,000) d against you in this actic claim as exempt with the Over, unless it is filed before filing of the list. Certain aring apparel (clothing) for the family Bible and sold derstand your exemption:	personal propert on and you wish to Clerk of the Court, re the judgment to in items are auton or yourself and you tool books. Shoul	y exemption from exe claim property as ex The list may be filed ecomes final, it will natically exempt by lear family and trunks of d any of these items	ecution or seizur empt, you must at any time and not be effective aw and do not r or other receptace be seized, you	file a written list, under may be changed by you e as to any execution or need to be listed. These cles necessary to contain would have the right to	
I,		, Clerk of the Court	, Trousdale Count	y, Tennessee, certify	this to be a true	and accurate copy as	
filed this	of						
Clerk			By	<i>7</i> :		D.C.	
			23	Kin Circ 303	n Taylor cuit Court Cle East Main S tsville, TN 3	rk treet, Room #2	
						ADA	

FEB/01/2021/MON 01:03 PM

I HEREBY CERTIFY THAT I HAVE SERVED	THE WITHIN SUMMONS:	
By delivering on the 8th day of March	, 20 <u>21</u> at <u>11:15 a.m</u> M. a copy o	f the summons and a copy of the
Complaint to the following defendant(s): Core by email to Erin Palmer Polly, Attorney for Core	Civic, Inc. CoreCivic, Inc., by agreement	at
Exim Palmin Polly Signature of Person Accepting Service	Bv:	ize Person to Serve Process
RETURN O	F NON-SERVICE OF SUMMONS	
I HEREBY CERTIFY THAT I HAVE NOT SEE	EVED THE WITHIN SUMMONS:	
To the named Defendantis (are) not	o be found in this County after diligen	because
following reason(s):	o be tound in this county after dingen	search and inquity for the
DATED: this day of	, 20	
	By: Sheriff or other Authorized	Person to Serve Process
PRIVATE PROCESS SERVER (PLEASE PRI	NT THE FOLLOWING)	
Name of Private Process Server	Address	
Company	Phone	Marie Control